EXHIBIT 2

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 1        Q        Okay.  And so, let's talk about direct

 2   versus indirect disputes.  Have you heard those terms

 3   before?

 4        A        Yes.

 5        Q        Tell me what a direct dispute is.

 6        A        A direct dispute is a dispute that we have

 7   received directly from the customer.  And an indirect

 8   would be something that is provided to us through a

 9   third-party agency like e-OSCAR.

10        Q        Okay.  So, direct dispute is the consumer

11   calling on the phone or writing a letter and saying,

12   hey, I have this -- this -- this dispute about

13   information that's in my Toyota account, right?

14        A        Correct.

15        Q        And then, an indirect dispute is one that

16   comes from a third party.  Typically, it's from a

17   credit bureau, right, TransUnion, Equifax or Experian?

18        A        Yes.

19        Q        Okay.  And that's what you mean by

20   e-OSCAR?  It comes --

21        A        They filter those through e-OSCAR.  Sorry.

22        Q        It's okay.  Let's start again.  When you

23   talk about e-OSCAR, that's the way that these disputes

24   are transmitted back and forth between the credit

25   bureaus and Toyota, right?
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 1        A       Correct.

 2        Q       And it's an electronic system that's used

 3   for that, and that's really all it's used for; isn't

 4   that right?

 5        A       Correct.

 6        Q       Okay.  So, let's go to Page 309.  I want

 7   to ask about a couple of things that are on here.  And

 8   these things that aren't highlighted.  There's one,

 9   the fourth bullet point says, the multiple credit

10   dispute letter comma 3100.  Do you see that?

11        A       Yes.

12        Q       And this is highlighted here on the

13   document, and the 3100 is in blue.  So, it seems like

14   it's hyperlinked.  Is that a fair characterization?

15        A       It could be.  I don't know that

16   personally.  That -- I have not clicked on that.

17        Q       Okay.  Because I tried it and it went

18   somewhere that I couldn't go because I'm not connected

19   to Toyota, I think.  I didn't click on this one

20   because on Agile Law it won't work.  But I clicked on

21   the PDF that was produced and nothing really happened.

22   It went somewhere on the internet and nothing

23   happened.

24                So, you're not sure whether or not that is

25   a hyperlink to the actual text of a letter, right?
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